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Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
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Gray Davis
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M60050_003601
MCAS EL TORO
SSIC NO. 5090.3.A

April 7, 2003

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station El Toro
7040 Trabuco Road
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DRAFT EXPLANATION OF SIGNIFICANT DIFFERENCES (ESD), INSTALLATION RESTORATION PROGRAM (IRP) SITE 11, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Piszkin:

The Department of Toxic Substances Control (DTSC) reviewed the above document dated February 10, 2003. The ESD provides justification to modify actions required at Site 11 as specified in the approved *Draft Final Record of Decision, Operable Unit 3A, Site 11, Marine Corps Air Station El Toro, California* (ROD), dated September 1999. The ESD addresses changes to risk based cleanup goals documented in the ROD based on updated toxicity values and additional sampling results.

After review of the draft ESD, DTSC has the following comments:

1. As recommended in *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (EPA 540-R-98-031) (United States Environmental Protection Agency, July 1999), additional changes resulting from modifications to the remedy should also be provided. A side-by-side comparison of the remedy components described in Section 9 of the ROD and those of the proposed remedy would be helpful. In particular, this comparison should include and address the following remedy components described in the ROD.

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- PCB-contaminated soil throughout the area of Units 1 and 2 will be excavated to a depth of approximately 2 feet below ground surface (bgs) (up to 6 feet bgs in a small area of Unit 2).
 - Approximately 233 bank cubic yards from Units 1 and 2 will be excavated.
 - Cost estimate for excavation and off-site disposal.
 - Confirmation soil sampling, including chemical analyses.
 - Excavation, characterization and disposal of contaminated soil at an appropriate off-Station facility.
 - Backfill and compaction of the excavations using clean fill material to return the area to original grade.
2. Section 1.0, Introduction, Page 1: The second paragraph lists the items that are addressed in the ESD. Both the first and third bulleted items address changes to cleanup goals based on updated toxicity criteria and slope factors. Please revise to one item. It is also recommended that an item for additional sampling results be included.
 3. Section 3.0, Basis for the Document, Page 3: The first partial paragraph ends, "Subsequently, a separate *Draft Final ROD* was issued for Site 11 in September 1999 (DON 1999a)." For clarification, please add that the ROD was also signed.
 4. Page 3, Section 3.1, Human Health Risk Assessment Summary: The fourth paragraph states, "The recalculated risks for the various units at Site 11 were in general lower than risk estimates presented in the RI report." However, the non-cancer risk (hazard index) for Unit 2 increased from 0.3 to 1.1 (Table 1-2, Site 11 Risk Reevaluation Summary). Please include an explanation for this increase.
 5. Section 3.1, Human Health Risk Assessment Summary, Page 4: The last sentence in this section states, "In addition, following the removal of contaminated soil, confirmation sampling results will be used to calculate the cumulative residual risk for each unit using the updated slope factors." Since the evaluation of cumulative residual risk is another significant difference, it may be more appropriate to include in Section 4.0, Description of Significant Differences.
 6. Page 4, Section 7.0, Public Participation: This section states that the ESD will be available for public review. Although not required, DTSC recommended that the ESD be made available for public comment due to the concern expressed by the Local Redevelopment Authority and Restoration Advisory Board when the Remedial Action Strategy for Site 11 was issued in December 1999; the cleanup goals presented in the strategy differed from those documented in the ROD. Additionally, please check spelling in the second paragraph.

SENSITIVE RECORD

**PORTIONS OF THIS RECORD ARE CONSIDERED SENSITIVE
AND ARE NOT AVAILABLE FOR PUBLIC VIEWING**

ADDRESS OF PRIVATE CITIZEN

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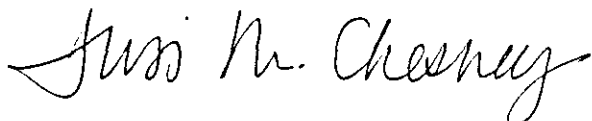
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7. Table 1-1, Comparison of Risk Assessment Parameters: For clarification, please include an explanation of acronyms used in the table.

Please contact me at (714) 484-5395 if you have any questions.

Sincerely,



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